

EXHIBIT B

From: Jacobs, Edward J. [<mailto:ejacobs@bakerlaw.com>]
Sent: Tuesday, February 28, 2017 7:11 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>; Shifrin, Maximillian S. <mshifrin@bakerlaw.com>
Subject: RE: Expert reports on trading issues

Hi Helen,

Is there a reason why you are contemplating contacting Judge Bernstein at this time regarding case management orders? While we are not opposed to extending discovery, I think it is premature to decide upon a schedule for experts until the conclusion of the Madoff deposition and any additional related discovery the Court may allow. As you know, we have discussed with Judge Bernstein the prospect of an omnibus trial on the early periods of the fraud, and we would like the benefit of Madoff's complete testimony and an opportunity to examine him before we further discuss that procedure. In any event, we would appreciate the opportunity to discuss with you further before you contact Judge Bernstein.

Regarding the records you requested, thank you for the additional detail. However, I am still unclear on exactly what you are looking for. Can you tell me where you are getting this description? Have you have seen this type of report before? Do they have a title? Can you attach a representative document? As you know, Madoff's fraud lasted decades and BLMIS generated many types of reports. I am happy to track these down in the data room and/or produce them to the extent they exist, and the information requested above will help me do that.

Regards,
Ted

-----Original Message-----

From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Tuesday, February 28, 2017 11:50 AM
To: Jacobs, Edward J.
Cc: Carlisle, Marie L.; Shifrin, Maximillian S.
Subject: Expert reports on trading issues

I would like to know your position on the following which I will propose to Judge Bernstein:

With respect to all defendants in whose cases discovery was not closed as of the date of my motion to depose Madoff, the defendants' expert reports would not be due until 60 days after we complete Madoff's deposition and any other discovery permitted by Judge Bernstein relating to issues raised in Madoff's deposition.

Helen Davis Chaitman
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-----Original Message-----

From: Helen Chaitman

Sent: Tuesday, February 28, 2017 8:51 AM

To: Jacobs, Edward J. <ejacobs@bakerlaw.com>

Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>; Shifrin, Maximillian S. <mshifrin@bakerlaw.com>

Subject: RE: Madoff trading records

We have searched in the Data Room and we have not found what I am looking for. That is why I am asking you to tell me where the documents can be found.

What I am looking for is precisely what I described in my 2/27 email. BLMIS prepared month-end inventories listing every security held in-house. This would include securities at DTC but it would include securities that were not with DTC. It is a comprehensive list of securities positions. I would like to know where those are in the E-Data room and I would like you to email me the reports for each month of 2000, 2002, 2004, 2006 and 2008.

Helen Davis Chaitman

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-----Original Message-----

From: Jacobs, Edward J. [<mailto:ejacobs@bakerlaw.com>]

Sent: Tuesday, February 28, 2017 7:47 AM

To: Helen Chaitman <hchaitman@chaitmanllp.com>

Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>; Shifrin, Maximillian S. <mshifrin@bakerlaw.com>

Subject: Re: Madoff trading records

Hi Helen,

I am not sure what you are seeking - are you looking for DTC records, or NSCC records we more recently produced, or something else? And for what period of time? If you can be more specific regarding dates and types of records we will do our best to locate them for you in the data room. In the meantime, the data room is fully searchable.

Ted

On Feb 28, 2017, at 7:00 AM, Helen Chaitman <hchaitman@chaitmanllp.com> wrote:

Marie and Ted: Madoff's deposition is coming up on March 14 and I want to review with him the month-end trading ledgers. Would you please let me know today where they are in the E-Data room?

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-----Original Message-----

From: Helen Chaitman
Sent: Friday, February 24, 2017 12:49 PM
To: Carlisle, Marie L. <mcarlisle@bakerlaw.com>
Cc: Jacobs, Edward J. <ejacobs@bakerlaw.com>
Subject: Re: Madoff trading records

I believe there is a month end inventory of owned securities that include securities at DTC but include securities that are not at DTC. Are these included in the site you gave me below?

Sent from my iPhone

> On Feb 24, 2017, at 11:43 AM, Carlisle, Marie L. <mcarlisle@bakerlaw.com> wrote:

>

> Helen,

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> Please direct all questions regarding E-Data Room 1 to Ted Jacobs and me.

>

> Based on your description below, we believe that the documents you are looking for are in the DTCC folder of E-Data Room 1. Please see the attached folder tree screenshot that was included with the Trustee's amended discovery responses on January 13, 2017.

>

> Thanks,

>

> Marie

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>

> From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]

> Sent: Thursday, February 23, 2017 7:01 AM

> To: Sabella, Michael A.

> Subject: Madoff trading records

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> Michael: I am trying to find certain documents in the E-Data Room, but I have not been able to locate them. Can you let me know where I can find Madoff's month-end reports of all securities held by BLMIS from 2000 on? These reports list every security held by BLMIS as of the end of each month.

>

> Thanks so much.

>

> Helen Davis Chaitman

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> <Chaitman Appendices to Amended Discovery Responses.pdf>

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